

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

OPENAI, INC.,

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LITIGATION

This Document Relates To:

News Cases

25-md-3143 (SHS) (OTW)

**NEWS PLAINTIFFS' MOTION TO SEAL**

Under paragraph 21 of the Stipulated Protective Order in the News Cases (*Daily News* Dkt. 129), News Plaintiffs respectfully seek to provisionally file under seal portions of their letter responding to the Court’s July 9, 2025 Order regarding the parties’ dispute about OpenAI’s use of the “AEO” designation. Dkt. 308. Plaintiffs seek to file portions of their letter under seal because these portions cite material designated by OpenAI as Protected Discovery Material under the Protective Order. Plaintiffs do not affirmatively seek to seal any material. Under the Protective Order, OpenAI has five business days to file a statement of reasons for why the material should be sealed. Plaintiffs will review OpenAI’s filings, and if necessary, confer about any disagreement.

Dated: July 10, 2025

Respectfully,

/s/ Davida Brook

Davida Brook (*admitted pro hac vice*)

SUSMAN GODFREY L.L.P.

1900 Ave of the Stars, Suite 1400

Los Angeles, CA 90067

Telephone: (310) 789-3100

Facsimile: (310) 789-3150

dbrook@susmangodfrey.com

**News Plaintiffs’ Liaison Counsel**